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Attorneys for LVMPD Defendants

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ROGER ALLEN ESPINOZA; ANGEL  
AGUILAR; DANIELLE AGUILAR; JOE  
PHILLIPS; DAN KELSEY; HARRY GARCIA;  
ROBERT RIOS; LONNIE GALLEGOS;  
ANTHONY ROJAS; KEVIN THOMAS;  
JANELLE LONG; BERNARDINO GARCIA;  
JOSEPH OROSCO; JOSEPH R. GALLEGOS;  
DAVE SILVA; MIGUEL HERNANDEZ;  
RAFAEL GARCIA ESPINOZA; GEORGE  
OLIVO; LYNN VILPONDO; JERALD  
MURILLO and CHARLES CHRISTOPHER  
GULAS,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, a Political Subdivision of the  
STATE OF NEVADA; SHERIFF DOUGLAS  
GILLESPIE; OFFICER WOOSNAM; OFFICER  
A. ASH (P#9325); OFFICER WILLIAM  
SCHOEN; THEN BOULDER CITY CHIEF OF  
POLICE THOMAS FINN; BOULDER CITY  
CAPTAIN VINNIE ALBOWEITZ; BOULDER  
CITY OFFICER PASTORE; DOES 1 through 10  
and ROES 11 through 20, inclusive,

Defendants.

Case No.: 2:12-cv-01093-RFB-VCF

**[PROPOSED] STIPULATION AND  
ORDER TO DISMISS THE LVMPD  
DEFENDANTS WITH PREJUDICE**

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Defendants LAS VEGAS METROPOLITAN POLICE DEPARTMENT, SHERIFF DOUGLAS GILLESPIE, OFFICER WOOSNAM, OFFICER A. ASH, and OFFICER WILLIAM SCHOEN (the “LVMPD Defendants”), by and through their counsel of record, Craig R. Anderson, Esq., of the law firm of Marquis Aurbach Coffing, and Plaintiffs ROGER ALLEN ESPINOZA, ANGEL AGUILAR, DANIELLE AGUILAR, JOE PHILLIPS, DAN KELSEY, HARRY GARCIA, ROBERT RIOS, LONNIE GALLEGOS, ANTHONY ROJAS, KEVIN THOMAS, JANELLE LONG, BERNARDINO GARCIA, JOSEPH OROSCO, JOSEPH R. GALLEGOS, DAVE SILVA, MIGUEL HERNANDEZ, RAFAEL GARCIA ESPINOZA, GEORGE OLIVO, LYNN VILPONDO, JERALD MURILLO and CHARLES CHRISTOPHER GULAS (“Plaintiffs”), by and through their counsel of record, Stephen P. Stubbs, Esq., hereby STIPULATE AND AGREE as follows:

1. All of Plaintiffs’ claims against Defendant Las Vegas Metropolitan Police Department are dismissed with prejudice;

2. All of Plaintiffs’ claims against Defendant Sheriff Douglas Gillespie are dismissed with prejudice;

3. All of Plaintiffs’ claims against Defendant Det. John Woosnam are dismissed with prejudice;

4. All of Plaintiffs’ claims against Defendant Ofc. A. Ash are dismissed with prejudice;

5. All of Plaintiffs’ claims against Defendant Ofc. William Schoen are dismissed with prejudice;

6. The LVMPD Defendants agree to bear their own costs and fees;

7. Plaintiffs agree to bear their own costs and fees; and

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8. That the LVMPD Defendants' Motion for an Order to Show Cause Why Plaintiffs Should not be Held in Contempt for Failure to Comply with the Court's September 24, 2015 Order (#147) is now MOOT and the February 4, 2016 hearing date on the motion can be VACATED.

IT IS SO STIPULATED this 28th day of January, 2016.

MARQUIS AURBACH COFFING

TAX LAW SOLUTIONS, LLC

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By: s/Stephen P. Stubbs  
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Attorney for Plaintiffs

**ORDER**

IT IS SO ORDERED this 1st day of February 2016, that Plaintiffs' claims against Defendants Las Vegas Metropolitan Police Department, Sheriff Douglas Gillespie, Det. John Woosnam, Ofc. A. Ash, and Ofc. William Schoen are dismissed with prejudice with each party to bear their own costs and fees; and the LVMPD Defendants' Motion for an Order to Show Cause Why Plaintiffs Should not be Held in Contempt for Failure to Comply with the Court's September 24, 2015 Order (#147) is ORDERED MOOT and the February 4, 2016 hearing date on the motion is VACATED.



RICHARD F. BOULWARE, II  
United States District Judge

